

To: Trulear, Brian[Trulear.Brian@epa.gov]
Cc: Bendik, Kaitlyn[bendik.kaitlyn@epa.gov]; Shamet, Stefania[Shamet.Stefania@epa.gov]; Menen, Christopher[menen.chris@epa.gov]; Price-Fay, Michelle[Price-Fay.Michelle@epa.gov]; Field, Stephen[Field.Stephen@epa.gov]
From: Seligman, Andrew
Sent: Fri 12/18/2015 3:07:21 PM
Subject: RE: ECHO Noncompliance

agreed

Andrew F. Seligman

Environmental Scientist & Enforcement Officer

NDPES Enforcement Branch

1650 Arch Street, 3WP42

Philadelphia, Pennsylvania

19103

(215)814-2097

"The Wind and Waves are always on the side of the ablest Navigators"

Edward Gibbon, English Historian 1734-1794

"There is no education like adversity"

Benjamin Disraeli, British Prime Minister

From: Trulear, Brian
Sent: Friday, December 18, 2015 9:54 AM
To: Seligman, Andrew <Seligman.Andrew@epa.gov>
Cc: Bendik, Kaitlyn <bendik.kaitlyn@epa.gov>; Shamet, Stefania <Shamet.Stefania@epa.gov>; Menen, Christopher <menen.chris@epa.gov>; Price-Fay, Michelle <Price-Fay.Michelle@epa.gov>; Field, Stephen <Field.Stephen@epa.gov>
Subject: Re: ECHO Noncompliance

Thanks all for coordinating this inquiry. Since the issue surrounds ECHO interpretation, I'm thinking a response to WA should come from the Enforcement Branch.

Sent from my iPhone

On Dec 18, 2015, at 9:44 AM, Seligman, Andrew <Seligman.Andrew@epa.gov> wrote:

I can work with you to look at the data.

Andrew F. Seligman

Environmental Scientist & Enforcement Officer

NDPES Enforcement Branch

1650 Arch Street, 3WP42

Philadelphia, Pennsylvania

19103

(215)814-2097

"The Wind and Waves are always on the side of the ablest Navigators"

Edward Gibbon, English Historian 1734-1794

"There is no education like adversity"

Benjamin Disraeli, British Prime Minister

From: Bendik, Kaitlyn

Sent: Friday, December 18, 2015 9:42 AM

To: Shamet, Stefania <Shamet.Stefania@epa.gov>; Seligman, Andrew <Seligman.Andrew@epa.gov>; Menen, Christopher <menen.chris@epa.gov>; Price-Fay, Michelle <Price-Fay.Michelle@epa.gov>

Cc: Trulear, Brian <Trulear.Brian@epa.gov>; Field, Stephen <Field.Stephen@epa.gov>

Subject: RE: ECHO Noncompliance

ECHO gets its information from ICIS—so both branches are kind of removed from that information as it is an automatic pull from ICIS. Nancy Ford from our Office of Program Support can manually make changes in ICIS. So whomever decides whether or not they are in non-compliance (again, I'm not sure if that's a permitting thing or an enforcement thing) can let Nancy know and then she can make the change.

So my question is, who would make that decision, permitting or enforcement? Andrew, if you want to work together on this to make that determination, that's fine by me.

From: Shamet, Stefania
Sent: Friday, December 18, 2015 9:35 AM
To: Seligman, Andrew <Seligman.Andrew@epa.gov>; Bendik, Kaitlyn <bendik.kaitlyn@epa.gov>; Menen, Christopher <menen.chris@epa.gov>; Price-Fay, Michelle <Price-Fay.Michelle@epa.gov>
Cc: Trulear, Brian <Trulear.Brian@epa.gov>; Field, Stephen <Field.Stephen@epa.gov>
Subject: RE: ECHO Noncompliance

There is no reason for me to get involved in case development (ie, the 308), but I would think ECHO is either correct and there is a basis for having a violation in there right now or it isn't. In any case, I'd recommend as a courtesy that somebody from whichever branch enters things into ECHO at least respond to his email.

From: Seligman, Andrew
Sent: Friday, December 18, 2015 9:31 AM
To: Shamet, Stefania <Shamet.Stefania@epa.gov>; Bendik, Kaitlyn <bendik.kaitlyn@epa.gov>; Menen, Christopher <menen.chris@epa.gov>; Price-Fay, Michelle <Price-Fay.Michelle@epa.gov>
Cc: Trulear, Brian <Trulear.Brian@epa.gov>; Field, Stephen <Field.Stephen@epa.gov>
Subject: RE: ECHO Noncompliance

We are in the process of issuing a 308 info letter at DDOEs request. Michelle thought it a good idea. The letter is to determine if WA has complied with a specific condition in the bypass EPA approved.

Andrew F. Seligman

Environmental Scientist & Enforcement Officer

NDPES Enforcement Branch

1650 Arch Street, 3WP42

Philadelphia, Pennsylvania

19103

(215)814-2097

"The Wind and Waves are always on the side of the ablest Navigators"

Edward Gibbon, English Historian 1734-1794

"There is no education like adversity"

Benjamin Disraeli, British Prime Minister

From: Shamet, Stefania

Sent: Friday, December 18, 2015 9:23 AM

To: Bendik, Kaitlyn <bendik.kaitlyn@epa.gov>; Seligman, Andrew <Seligman.Andrew@epa.gov>; Menen, Christopher <menen.chris@epa.gov>; Price-Fay, Michelle <Price-Fay.Michelle@epa.gov>

Cc: Trulear, Brian <Trulear.Brian@epa.gov>; Seligman, Andrew <Seligman.Andrew@epa.gov>; Field, Stephen <Field.Stephen@epa.gov>

Subject: RE: ECHO Noncompliance

I believe Andrew Seligman is the assigned staff

From: Bendik, Kaitlyn

Sent: Friday, December 18, 2015 7:27 AM

To: Seligman, Andrew <Seligman.Andrew@epa.gov>; Shamet, Stefania <Shamet.Stefania@epa.gov>; Menen, Christopher <menen.chris@epa.gov>; Price-Fay, Michelle <Price-Fay.Michelle@epa.gov>

Cc: Trulear, Brian <Trulear.Brian@epa.gov>

Subject: FW: ECHO Noncompliance

FYI. This might be an enforcement issue.

From: Gray, Wendy
Sent: Thursday, December 17, 2015 6:04 PM
To: Trulear, Brian <Trulear.Brian@epa.gov>
Cc: Bendik, Kaitlyn <bendik.kaitlyn@epa.gov>; Wisniewski, Patti-Kay <Wisniewski.Patti-Kay@epa.gov>; rogers, rick <rogers.rick@epa.gov>
Subject: Fwd: ECHO Noncompliance

Brian,

I'm not sure if your office is best to address this or whether enforcement is.

This is a request by the Washington Aqueduct drinking water system.

Wendy Gray, P.E.

Environmental Engineer

US EPA Region III

Drinking Water Branch

1650 Arch Street (3WP21)

Philadelphia, PA 19103

Office: (215) 814-5673

Cell: (267) 216-6521

Fax: (215) 814-2302

Gray.Wendy@EPA.gov

Begin forwarded message:

From: "Choudhary, Shabir A WAD" <Shabir.A.Choudhary@usace.army.mil>
Date: December 17, 2015 at 11:49:40 AM EST
To: "Gray, Wendy" <Gray.Wendy@epa.gov>
Cc: "Jacobus, Thomas P WAD" <Thomas.P.Jacobus@usace.army.mil>, "Cole,

Nathan H WAD" <Nathan.H.Cole@usace.army.mil>, "Tesema, Mel M WAD" <Mel.M.Tesema@usace.army.mil>, "Bratton, Richard E MAJ WAD" <Richard.E.Bratton@usace.army.mil>, "Taylor, Reginald E WAD" <Reginald.E.Taylor@usace.army.mil>

Subject: ECHO Noncompliance

Hi Wendy:

Happy Holidays! Hope that you are enjoying the holiday season and in good spirit.

I tried to call you but could not get in touch with you. Washington Aqueduct (WA) needs your immediate assistance with respect to compliance status in the Enforcement and Compliance History Online (ECHO).

This database is showing noncompliance for WA for FY 2014 and FY 2015 and this is related to permitted/authorized discharges requested by WA and approved by EPA Region 3 under the "bypass" clause of the NPDES Permit #0000019.

WA is requesting correction so that this error in the of this database be corrected and noncompliance be removed. We became aware of this issue when we were gathering needed information to for the Environmental Awards with the Army. To be eligible for this award, the organization should not have significant noncompliance. When the ECHO database was searched, it reported two noncompliance during the FY 2014 and FY 2015 (see 2 attachments). For this period, all of the discharges from WA have always been in compliance with the conditions stipulated by EPA Region 3 in approval of "bypass" requests.

Our eligibility is determined by what's reported in the EPA's Enforcement and Compliance History Online (ECHO). The specific eligibility criteria is below:

"Compliance History. Each installation in the U.S. or its territories shall submit the latest available Detailed Facility Report from the ECHO database (<https://www.echo.epa.gov>). Installations with High Priority Violations (HPV) or Significant Non-Compliance (SNC) during the 2014-2015 achievement period will be ineligible to compete in any category of the SecArmy and SecDef Environmental Awards, unless the installation can prove (with supporting documentation) that its inclusion in the ECHO report is erroneous. Prior to submitting nomination packages to OACSIM, ACOMs/Agencies shall screen nominees against the ECHO report, as well as their own internal reporting on environmental violations, at each of the installations nominated."

Therefore, WA is requesting EPA Region 3 a formal letter stating that "Washington Aqueduct does not have High Priority Violations (HPV) or Significant Non-Compliance (SNC) during the 2014-2015 period so that we can proceed with our request for Environmental Awards with the Army.

Your immediate help is requested in this regard as the deadline for this submission is

12/27/2015.

Thanking you in anticipation.

Regards,

Shabir A. Choudhary, P.E.

Section Chief

Washington Aqueduct

Phone:202-764-2771 Office and 202-345-2734 Cell

You are here [Home](#) » [Detailed Facility Report](#)

Detailed Facility Report

[+ Expand All](#) [- Collapse All](#)

Facility Summary



US ARMY CORP
5900 MACART
20016 ⓘ

FRS ID: [1100005](#)
EPA Region: 03
Latitude: 38.938
Longitude: -77.1
Locational Data 5
Industry: Utilities
Indian Country:

Enforcement and Compliance Summary ⓘ

Statute ⓘ	Insp (5 Years) ⓘ	Date of Last Inspection ⓘ	Current Compliance Status ⓘ	Qtrs in NC (of 12) ⓘ	Qtrs in Significant Violation ⓘ
CAA	--	--	--	--	--
CWA	4	05/13/2015	Noncompliance	7	1
RCRA	--	04/20/2005	No Violation	0	0
SDWA	--	--	No Violation	0	0

Related Reports

[A Air Pollutant Report](#)

Regulatory Information

Clean Air Act: No Informa

<image002.png>